

D.V. FILE



Illinois Environmental Protection Agency . P.O. Box 19276, Springfield, IL 62794-9276

618/346-5120

1630450034 -- St. Clair County
E. St. Louis/Pfizer, Inc.
ILD006317119
Compliance File

EPA Region 5 Records Ctr.



390926

Certified #: 9131 205 622

April 7, 1989

Pfizer, Inc.
Attn: Chris Dorow
Environmental Engineer
2001 Lynch Ave.
E. St. Louis, IL 62205

Dear Mr. Dorow:

On February 1, 1989, your facility was inspected by Wendy Schaufelberger representing the Illinois Environmental Protection Agency. The purpose of this inspection was to determine your facility's compliance with 35 Ill. Adm. Code, Part 703 through 725. A copy of the inspection report is enclosed.

Based on information obtained at the time of the inspection, it appears your facility is presently not regulated as a generator, storer or treater under 35 Ill. Adm. Code, Part 703 through 725.

Therefore, you should request in writing within 30 days of the date of this letter to withdraw your EPA Notification Form 8700-12.

This request should be sent to the following:

Illinois Environmental Protection Agency
Division of Land Pollution Control #24
Information Management Section
2200 Churchill Road
Springfield, IL 62794

Attn: Mike Walwer

If, however, you wish to retain your Federal I.D. number for possible future use, please document your intent in a letter to this office within 30 days.

In either event, this documentation will be used to code your facility as a non-handler at the present time. Should you handle waste in the future, you will have to comply with the applicable requirements of 35 Ill. Adm. Code, Part 703



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through 725. You would also be required to send a letter to the Illinois Environmental Protection Agency Division of Land Pollution, 2200 Churchill Road, Springfield, IL 62794 requesting your I.D. number be returned to active status.

If you have any questions, please contact Wendy Schaufelberger at 618/346-5120.

Sincerely,

A handwritten signature in cursive script that reads "Glenn D. Savage".

Glenn D. Savage, Section Manager
Field Operation Section
Division of Land Pollution Control

GOS/TAH:lhe

Enclosure

cc: Wendy Schaufelberger -- Collinsville Region
Division File
Chris Nifong
Tom Henninger

TEPA NUMBER: 1630450034

State: IL Zip Code: 62205

Region: 6 Date of Inspection: 2/1/89 From: 10:00 a.m. to 11:00 a.m.
Weather (LDF Only): 40° Overcast

Record Review: Follow-up to Inspection of : Other:

Small Quant. Gen.: Claimed Nonhandler: ☒ Other (Specify in narrative):

Has the firm been referred to: USEPA? yes ___ no X; IAG? yes ___ no X; County
States Attorney? yes ___ no X. Date of referral to USEPA: _____,
IAG: _____, County States Attorney: _____.

USEPA Compliance Order Issued: Illinois PCB Order Issued:

[illegible]

Telephone #: 618/271-276

Street: 2001 LUNCH AVE

City: East St. Louis

State: IL Zip Code: 62205

Owner: Pfizer, Inc

Telephone #: 212/573-23

Street: 235 East 142nd St

City: New York

State: NY Zip Code: 10017

Person Interviewed

Title : Telephone #

Jeff Carlton

Safety/Environmental Engineer 618/271-470

Chris Dorow

Safety/Environmental Engineer 618/271-4

Inspection Participants

Agency/Title

Telephone #

Wendy Schauselberger

TEPA / EPS

618/346-512

Prepared By

Agency/Title

Telephone 4

Wendie Schaefferberger

IEPA/EP5

618/346-5120

Summary of Apparent Violations

Area	Class	Section
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Area | Class | Section

. Area | Class | Section .

[illegible]

WASTE DISTRIBUTION FORM

Facility Name: Pfizer, Inc.

USEPA.#: IL0006317119

IEPA #: 650750024

[illegible]

St. Clair Co. - 1630450034
East St. Louis/Pfizer
ILD006317119

FEB 14 1989

RCRA-DLPC

REMARKS

On February 1, 1989, a site visit was conducted at the subject facility in conjunction with their Part A withdrawal request. Pfizer Pigments, Inc. in East St. Louis manufactures a variety of iron oxide products. Representing the facility were Jeff Carlton and Chris Dorow. The iron oxide products are used primarily as raw materials in the coating and magnetic tape industries. The facility uses spent pickle liquor from steel operations (K062) as a substitute for virgin acid in the production of the iron oxide. The iron oxide process consists of the following operations. Scrap iron is dissolved in an acid source (sulfuric or hydrochloric acid). The acid used can be either virgin acid or spent pickle liquor. This is called the neutralization step and it takes place in large heated reactor tanks called neutralizers. The acid is neutralized by the scrap iron. The reaction continues until the pH of the solution exceeds 4.0. The solution is then placed in clarification tanks to settle out the suspended solids caused by various impurities. The settled solids are then transferred to the wastewater treatment operation where lime is added in order to increase the pH to 7-8. The neutralized wastewater is pumped to a clarifier, where the solids settle out. The solids are dewatered and disposed of at a landfill as a special, non-hazardous waste. The effluent from the clarifiers goes to the American Bottoms Regional Wastewater Treatment Plant in Sauget. After the solids are removed the solution is pumped to storage tanks. The iron oxide is precipitated, settled, washed on vacuum and pressure filters, dried, and packed for shipment. The wastes generated by the iron oxide production process would be the same whether virgin acid or spent pickle liquor (K062) were used.

When RCRA was passed in 1976 the facility was classified as a solid waste management site due to the neutralization processes conducted on the spent pickle liquor. The appropriate permits were applied for and granted. However, new regulations were adopted by the USEPA in 1985 to encourage the beneficial reuse of hazardous waste and adopted thereafter by Illinois. Due to the fact the facility utilizes the spent pickle liquor in the same manner as it would use virgin acid, it is exempt from TSD regulations by Ill. Adm. Title 35, Section 721.102(e)(1)(B). The facility should be reclassified as generator only status and the Part A withdrawn. The facility is retaining generator status in case the need arises to manifest hazardous waste. Currently though, the facility is a non-handler. See the attached letter dated March 22, 1988, from the Permit Section.

A site tour was taken of the iron oxide production units and a review of the other waste streams generated by the facility was conducted. Other waste streams generated by the facility include Neutralizer Cleanings, Wastewater Sludge, and Iron Oxide Waste. All three of these are permitted as non-hazardous special waste and disposed of in one of the following landfills: BFI Modern, or Laidlaw of Belleville. The facility also generates a small quantity of lab waste which is incinerated at TWI in Sauget, and waste oil which is shipped to Consolidated Recycling in Terre Haute, IN. From observations made during this inspection, the facility apparently does not handle hazardous waste with the exception of a small quantity of lab waste.

WGS:pbo/0307L